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ATTORNEYS FOR PLAINTIFF
FEDERAL TRADE COMMISSION

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

V.

NEXTCLICKMEDIA, LLC, *et al.*,

Defendants.

Case No. C08-1718-VRW

**STIPULATION FOR ORDER
EXTENDING DEADLINE FOR FILING
RESPONSIVE PLEADINGS AND
~~PROPOSED~~ ORDER**

WHEREAS, Defendants NextClickMedia, LLC's, Next Internet, LLC's, Kenneth Chan's and Albert Chen's (collectively, "Defendants") response to Plaintiff Federal Trade Commission's (the "FTC") Complaint is currently due on Monday, May 4, 2009;

WHEREAS the parties have recently concluded several days of intensive settlement discussions and are currently negotiating the terms of a settlement agreement;

WHEREAS, the FTC is willing to extend the time for Defendants to file their responses to Plaintiff's Complaint in order to finalize those settlement negotiations;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the FTC and Defendants, through their respective counsel, that Defendants' time to move, answer or

1 otherwise respond to the Complaint shall be and hereby is extended to and including August 3,
2 2009; and

3 IT IS FURTHER STIPULATED that the Case Management Conference, currently
4 scheduled for June 25, 2009, at 3:30 p.m., be rescheduled to September 24, 2009, at 3:30 p.m.,
5 and that the date for filing the Case Management Statement be extended to September 14, 2009.

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7 Dated: 4/30/09

/s/

8 MICHAEL C. LYNCH
9 D. REED FREEMAN
KELLEY DRYE & WARREN LLP
ATTORNEY FOR DEFENDANTS

10 Dated: 4/30/09

/s/

11 JANICE L. CHARTER
12 DAVID M. NEWMAN
THOMAS N. DAHDOUH
ATTORNEYS FOR PLAINTIFF

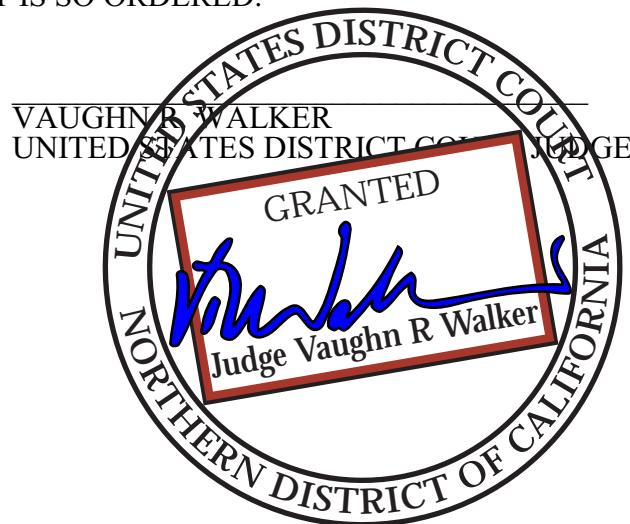
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ORDER

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16 Dated: May 5, 2009



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